From: <u>Barbara Vlamis</u>

To: sfarahnak@waterboards.ca.gov; Billington,

Tracie;

CC:

Subject: Sac Valley Implementation Funding

Date: Thursday, February 08, 2007 4:06:34 PM

Attachments: <u>barbarav.vcf</u>

February 8, 2007

Re: Do not fund or partially fund the Sacramento Valley Integrated Regional Water Management (SVIRWM) Implementation Proposal

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Dear Ms. Farahnak and Ms. Billington,

Butte Environmental Council, representing over 850 members, reiterates again that the SVIRWM implementation proposal should not be funded in any way. The Northern California Water Association (NCWA) and its Joint Powers Authority (JPA) do not represent Butte County, Chico, or Oroville nor does the SVIRWM Plan represent the public's interest. The Plan, which is necessary to apply for implementation grants, failed as a "grassroots, bottom-up program comprised of many projects, plans, and partnerships with common objectives and a long-term vision." The SVIRWM Plan should be rejected and implementation funding denied due to the absence of a genuine, regional plan.

The SVIRWM Plan also failed to provide an accurate assessment of the existing conditions of the aquifer, surface and subsurface hydrologic flow processes, and estimates of conditions under prolonged droughts. Until this level of analysis is conducted, funding any implementation projects is premature Furthermore, we believe that the necessary, preliminary studies of the hydrogeology of the Lower Tuscan Aquifer and its respective recharge areas be undertaken by objective parties *prior* to reinitiating a comprehensive planning process that might actually

look at the needs of the entire region. Pursuing projects, for conjunctive use of the surface and ground waters prior to legitimate planning is grossing negligent.

The SVIRWM Plan referenced the need to meet the "Phase 8 Settlement Agreement" requirements as stipulated in the Sacramento Valley Water Plan and states that the EIS/EIR will be completed in mid-2007. It seems prudent to wait and review that material to determine the most effective and conservative strategies to employ in developing an integrated regional water management plan implementation strategy. In addition, the ground water that is crucial for the economy and environment is *not* any part of the Phase 8 settlement and should not be considered or funded as part of the solution for SWP and CVP contractors.

As you well know, there isn't a water shortage in California as claimed by the applicant. The California Water Plan, released in 2005, indicates that water demand will decline in the next 25 years even with population increases (see link below). Using the same model the state used for its projections, the Pacific Institute found that California could actually *decrease* water use by 20% over the next 25 years while maintaining a vibrant economy (http://www.pacinst.org/reports/california_water_2030/index.htm

Please keep BEC apprised of any future meetings or action taken in regard to the SVIRWM Plan or implementation proposal.

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Regards,
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<>Barbara Vlamis, Executive Director
Butte Environmental Council
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